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*Attorneys for Mark D. Waldron, in his capacity  
as the duly-appointed Chapter 11 Trustee herein*

8 **UNITED STATES BANKRUPTCY COURT**  
9 **EASTERN DISTRICT OF WASHINGTON**

10 In re:

11 GIGA WATT, Inc., a Washington  
12 corporation,

13 Debtor.

Case No. 18-03197

The Honorable Frederick P. Corbit

Chapter 11

**NOTICE OF MOTION OF THE  
CHAPTER 11 TRUSTEE FOR  
ORDER (I) EXTENDING  
DEADLINE TO FILE PROOFS OF  
CLAIM, (II) APPROVING  
PROCEDURE RELATING TO  
NOTICE TO TOKEN HOLDERS  
AND MINER OWNERS, (III)  
APPROVING THE FORM OF  
SECOND NOTICE OF CASE  
COMMENCEMENT AND NOTICE  
OF FIRST EXTENDED BAR DATE,  
AND (IV) GRANTING EXPEDITED  
CONSIDERATION**

1       **PLEASE TAKE NOTICE** that Mark Waldron, in his capacity as the duly  
2 appointed Chapter 11 trustee (the “Chapter 11 Trustee”)<sup>1</sup> in the bankruptcy case of  
3 the above-captioned debtor (the “Debtor” or “Giga Watt”), has respectfully moved  
4 (the “Motion”) this Court pursuant to 11 U.S.C. §§ 105(a) and 107(c), Fed. R.  
5 Bank. P. 2002(g), Fed. R. Bank. P. 3003(c), Fed. R. Bank. P. 9007, LBR 2002-  
6 1(b)(3), LBR 2002-1(b)(4) and LBR 9018-1(b) for entry of an Order:

- 7       (i)     Extending the deadline to file proofs of claim to April 19, 2019 (the  
8               “First Extended Bar Date”);
- 9       (ii)    Approving procedures relating to notice to Token Holders and Miner  
10              Owners (as defined and set forth more fully in the Motion and  
11              supporting memorandum submitted herewith);
- 12       (iii)   Approving the form of the proposed Second Notice of Case  
13              Commencement and of the First Extended Bar Date, a copy of which  
14              is attached to the Motion as **Exhibit A**; and
- 15       (iv)    Reducing the time to object to the Motion to seven (7) days of the  
16              date of this Notice.

17       **PLEASE TAKE FURTHER NOTICE** that along with the Motion, the  
18 Chapter 11 Trustee has filed the *Memorandum of Points and Authorities in*  
19 *Support of Motion of Chapter 11 Trustee for Order (i) Extending Deadline to File*  
20 *Proofs of Claim, (ii) Approving Procedure Relating to Notice to Token Holders*  
21 *and Miner Owners, (iii) Approving the Form of Second Notice of Case*

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23 <sup>1</sup> Unless otherwise defined herein, capitalized terms in this Noting have the meanings ascribed  
to them in the Motion.

1 *Commencement and Notice of First Extended Bar Date, and (iv) Granting*  
2 *Expedited Consideration* and the supporting declarations of the Chapter 11  
3 Trustee and of Lauren Mieke, submitted herewith.

4 **PLEASE TAKE FURTHER NOTICE** that if you oppose the Motion, you  
5 must file your written response with the Court Clerk, 904 West Riverside Ave.,  
6 Suite 304, Spokane, WA 99201, and deliver a copy to the undersigned WITHIN  
7 SEVEN (7) DAYS OF THE DATE OF THIS NOTICE OF MOTION AND  
8 MOTION.

9 **PLEASE TAKE FURTHER NOTICE** that in the Motion the Chapter 11  
10 Trustee is asking for a reduction of the time to object to the Motion from twenty-  
11 one (21) days to seven (7) days. The Chapter 11 Trustee expects to be filing  
12 various motions with the Court in short order. The Token Holders and Miner  
13 Owners are entitled to full notice of these motions. The Chapter 11 Trustee has  
14 respectfully argued to the Court that shortening the objection period for this  
15 Motion, which establishes a procedure for full and fair notice to these key players,  
16 will facilitate those later important motions by establishing in advance the method  
17 by which all parties may serve the Token Holders and Miner Owners.

18 **PLEASE TAKE FURTHER NOTICE** that objections may be made to the  
19 Chapter 11 Trustee's request to reduce the period by which parties may object to  
20 the Motion.

21 **PLEASE TAKE FURTHER NOTICE** that if an objection is filed, the  
22 Court will consider your objections at the time of hearing on the Motion for the  
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1 principal relief requested. You will receive separate notice of the time and  
2 location of the hearing on your objection and of the Motion.

3 **PLEASE TAKE FURTHER NOTICE** that in support of the Motion, the  
4 Chapter 11 Trustee is submitting with this Notice and has filed with the Court a  
5 *Memorandum of Points and Authorities in Support of Motion of the Chapter 11*  
6 *Trustee for Order (i) Extending Deadline to File Proofs of Claim, (ii) Approving*  
7 *Procedure Relating to Notice to Token Holders and Miner Owners, (iii)*  
8 *Approving the Form of Second Notice of Case Commencement and Notice of First*  
9 *Extended Bar Date, and (iv) Granting Expedited Consideration* and supporting  
10 declarations by the Chapter 11 Trustee and Lauren Mieke, who has been retained  
11 as a consultant to the Chapter 11 Trustee.

12 *[This Notice continues on the next page.]*  
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**PLEASE TAKE FURTHER NOTICE** that the Court may enter an order without actual hearing or further notice unless a written objection is timely served and filed. If an objection is timely served and filed, you will receive notice of the date and time of a hearing on your objection.

Dated: February 19, 2019

CKR LAW LLP

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